19-10412-jlg Doc 388 Filed 04/10/19 Entered 04/10/19 16:08:25 Main Document Pg 1 of 8

WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue

New York, New York 10153 Telephone: (212) 310-8000 Facsimile: (212) 310-8007 Ray C. Schrock, P.C.

Sunny Singh

Attorneys for Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re

Chapter 11

Chapter 11

Chapter 11

Case No. 19-10412 (JLG)

Debtors. 1

(Jointly Administered)

NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON APRIL 11, 2019 AT 11:00 A.M.

Location of Hearing: United States Bankruptcy Court for the Southern District of New York,

before the Honorable James L. Garrity, Jr., United States Bankruptcy Judge, One Bowling Green, Courtroom 601, New York, New York

10004

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are Ditech Holding Corporation (0486); DF Insurance Agency LLC (6918); Ditech Financial LLC (5868); Green Tree Credit LLC (5864); Green Tree Credit Solutions LLC (1565); Green Tree Insurance Agency of Nevada, Inc. (7331); Green Tree Investment Holdings III LLC (1008); Green Tree Servicing Corp. (3552); Marix Servicing LLC (6101); Mortgage Asset Systems, LLC (8148); REO Management Solutions, LLC (7787); Reverse Mortgage Solutions, Inc. (2274); Walter Management Holding Company LLC (9818); and Walter Reverse Acquisition LLC (8837). The Debtors' principal offices are located at 1100 Virginia Drive, Suite 100, Fort Washington, Pennsylvania 19034.

I. <u>STATUS CONFERENCE</u>:

1. Case Status.

II. <u>UNCONTESTED MATTERS</u>:

2. Motion of Debtors Requesting Authority to (I) Continue Using Existing Cash Management System, Bank Accounts, and Business Forms, (II) Implement Changes to the Cash Management System in the Ordinary Course of Business, (III) Continue Intercompany Transactions, (IV) Provide Administrative Expense Priority for Postpetition Intercompany Claims, (V) Extend Time to Comply with, or Seek Waiver of, 11 U.S.C. § 345(b) and (VI) Granting Related Relief [ECF No. 4]

Response Deadline: March 19, 2019 at 4:00 p.m.

Resolved Response:

A. Limited Objection of Official Committee of Unsecured Creditors [ECF No. 214]

Related Document:

B. Certificate of No Objection [ECF No. 386]

<u>Status</u>: The Limited Objection of Official Committee of Unsecured Creditors has been resolved and this matter is going forward on an uncontested basis.

3. Motion of Debtors for Authority to Extend the Time to Assume or Reject Unexpired Leases of Nonresidential Real Property [ECF No. 285]

Response Deadline: April 4, 2019 at 4:00 p.m.

Responses Filed: None.

Related Documents: None.

Status: This matter is going forward on an uncontested basis.

4. Motion of Debtors for Authorization to (I) Reject Unexpired Lease of Nonresidential Real Property and (II) Abandon Property in Connection Therewith [ECF No. 320]

Response Deadline: April 4, 2019 at 4:00 p.m.

Response Filed:

A. Objection of STAG III Rapid City, LLC [ECF No. 364]

Related Document: None.

<u>Status</u>: The Objection of STAG III Rapid City, LLC has been resolved and this matter is going forward on an uncontested basis.

III. CONTESTED MATTERS:

5. Debtors' Motion for Interim and Final Orders (A) Authorizing Debtors to Enter into Repurchase Agreement Facilities, Servicer Advance Facilities and Related Documents; (B) Authorizing Debtors to Sell Mortgage Loans and Servicer Advance Receivables in Ordinary Course of Business; (C) Granting Back-Up Liens and Superpriority Administrative Expense Claims; (D) Authorizing Use of Cash Collateral and Granting Adequate Protection; (E) Modifying the Automatic Stay; (F) Scheduling a Final Hearing; and (G) Granting Related Relief [ECF No. 26]

Response Deadline: March 19, 2019 at 4:00 p.m.

Resolved Responses:

- A. Objection of Texas Taxing Jurisdictions [ECF No. 151]
- B. Objection of Maricopa County Treasurer [ECF No. 209]

Responses Filed:

- C. Objection of International Fidelity Insurance Company and Allegheny Casualty Company [ECF No. 161]
- D. Protective Objection of Geary Class Action [ECF No. 163]
- E. Objection of Official Committee of Unsecured Creditors [ECF No. 213]

Related Documents:

- F. Debtors' Omnibus Reply to Objections to Debtors' Entry into Debtor in Possession Financing and Use of Cash Collateral [ECF No. 344]
- G. Statement of Credit Suisse First Boston Mortgage Capital LLC, as administrative Agent, Credit Suisse AG and Alpine Securitization LTD [ECF No. 244]
- H. Joinder of DIP Agent to Debtors' Omnibus Reply [ECF No. 345]
- I. Statement of Term Loan Ad Hoc Group [ECF No. 346]
- J. Declaration of Jeffrey Lewis [ECF No. 27]
- K. Notice of Filing Exhibits to DIP Motion [ECF No. 49]

- L. Interim Order [ECF No. 53]
- M. Notice of Filing Revised Exhibits to DIP Motion [ECF No. 63]
- N. Notice of Filing of DIP HMBS Repo Facility Agreements [ECF No. 368]

Status: This matter is going forward on a contested basis.

6. Motion of Debtors for Entry of an Order (I) Approving Disclosure Statement and Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Sale and Confirmation Hearing, (IV) Approving Sale and Confirmation Objection Procedures and Notice of Sale and Confirmation Hearing, (V) Approving Bidding Procedures, (VI) Approving Assumption and Assignment Procedures, and (VII) Granting Related Relief [ECF No. 147]

Response Deadline: April 4, 2019 at 4:00 p.m.

Resolved Response:

A. Objection of the Official Committee of Unsecured Creditors [ECF No. 337]

Responses Filed to Bid Procedures:

- B. Limited Objection of Certain Trustees [ECF No. 338]
- C. International Fidelity Insurance Company and Allegheny Casualty Company's Objections [ECF No. 341]
- D. Sur-Reply of Certain Trustees to Debtors' Omnibus Reply to Bidding Procedures Objections [ECF No. 382]

Adjourned Responses to Disclosure Statement:

- E. Objection of Creditor Marsha Chambers [ECF No. 264]
- F. The Geary Class Action's Objections [ECF No. 336]
- G. Objection of the Official Committee of Unsecured Creditors [ECF No. 337]
- H. International Fidelity Insurance Company and Allegheny Casualty Company's Objections [ECF No. 341]
- I. Objection of the United States Trustee to the Approval of the Disclosure Statement for Joint Chapter 11 Plan [ECF No. 348]
- J. Joinder of Richard Legans, *et al.* to Objection of the Official Committee of Unsecured Creditors [ECF No. 352]

- K. Joinder of Richard Legans, *et al.* to Objections of the Geary Class Action [ECF No. 353]
- L. Joinder of Richard Legans, *et al.* to Objections of the Geary Class Action [ECF No. 354]
- M. Objection of Richard Legans, et al. [ECF No. 355]

Related Documents:

- N. Notice of Filing of Revised Proposed Order (I) Approving Bidding Procedures, (II) Approving Assumption and Assignment Procedures, and (III) Granting Related Relief [ECF No. 383]
- O. Debtors' Omnibus Reply to Objections [ECF No. 359]
- P. Statement of Term Loan Ad Hoc Group [ECF No. 361]
- Q. Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors [ECF No. 145]
- R. Disclosure Statement for Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors [ECF No. 146]
- S. Declaration of D. Reid Snellengarger [ECF No. 148]
- T. Notice of Filing of Proposed Order [ECF No. 150]
- U. Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors [ECF No. 314]
- V. Amended Disclosure Statement for Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors [ECF No. 315]
- W. Notice of Filing of Revised Proposed Order [ECF No. 316]
- X. Memorandum Endorsed Order Approving Request to file Sur-Reply [ECF No. 381]

<u>Status</u>: This matter is going forward on a contested basis solely with respect to the Debtors' request for Approval of Bidding Procedures Motion. The Motion has been adjourned to April 23, 2019 at 2:00 p.m. with respect to approval of the Disclosure Statement and Solicitation Procedures.

7. Motion of Debtors for Entry of an Order Approving Key Employee Incentive Program [ECF No. 228]

Response Deadline: April 4, 2019 at 4:00 p.m.

Responses Filed:

- A. The Geary Class Action's Objection [ECF No. 335]
- B. Objection of the United States Trustee [ECF No. 347]
- C. Joinder of Richard Legans, *et al.* to Objections of the United States Trustee [ECF No. 350]
- D. Joinder of Richard Legans, *et al.* to Objections of the Geary Class Action [ECF No. 353]

Related Documents:

- E. Debtors' Omnibus Reply to Objections [ECF No. 358]
- F. Statement of Term Loan Ad Hoc Group in Support of Debtors' Omnibus Reply to Objections [ECF No. 360]

Status: This matter is going forward on a contested basis.

8. Motion of Sonya Davis, et al. for Relief from the Automatic Stay [ECF No. 180]

Response Deadline: April 4, 2019 at 4:00 p.m.

Response Filed:

A. Debtors' Objection [ECF No. 342]

Related Documents: None.

Status: This matter is going forward on a contested basis.

9. Motion of Chris Alan and Samantha Jane Prior, et al. for Relief from the Automatic Stay [ECF No. 221]

Response Deadline: April 4, 2019 at 4:00 p.m.

Response Filed:

A. Debtors' Objection [ECF No. 343]

Related Documents: None.

Status: This matter is going forward on a contested basis.

10. Motion to Extend Time of Chris Alan and Samantha Jane Prior, *et al.* to Object to Discharge [ECF No. 223]

Response Deadline: April 4, 2019 at 4:00 p.m.

19-10412-jlg Doc 388 Filed 04/10/19 Entered 04/10/19 16:08:25 Main Document Pg 7 of 8

Response Filed:

A. Debtors' Limited Objection [ECF No. 340]

Related Documents: None.

Status: This matter is going forward on a contested basis.

11. Motion of Michael Strausbaugh for Relief from the Automatic Stay [ECF No. 234]

Response Deadline: April 4, 2019 at 4:00 p.m.

Response Filed:

A. Debtors' Objection [ECF No. 339]

Related Documents: None.

Status: This matter is going forward on a contested basis.

IV. <u>ADJOURNED MATTERS</u>:

12. Motion of Debtors for Entry of an Order (I) Approving Disclosure Statement and Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Sale and Confirmation Hearing, (IV) Approving Sale and Confirmation Objection Procedures and Notice of Sale and Confirmation Hearing, (V) Approving Bidding Procedures, (VI) Approving Assumption and Assignment Procedures, and (VII) Granting Related Relief [ECF No. 147]

Response Deadline: April 4, 2019 at 4:00 p.m.

Responses Filed:

- A. Objection of Creditor Marsha Chambers [ECF No. 264]
- B. The Geary Class Action's Objections [ECF No. 336]
- C. Objection of the Official Committee of Unsecured Creditors [ECF No. 337]
- D. International Fidelity Insurance Company and Allegheny Casualty Company's Objections [ECF No. 341]
- E. Objection of the United States Trustee to the Approval of the Disclosure Statement for Joint Chapter 11 Plan [ECF No. 348]
- F. Joinder of Richard Legans, *et al.* to Objection of the Official Committee of Unsecured Creditors [ECF No. 352]

- G. Joinder of Richard Legans, et al. to Objections of the Geary Class Action [ECF No. 353]
- Н. Joinder of Richard Legans, et al. to Objections of the Geary Class Action [ECF No. 354]
- I. Objection of Richard Legans, et al. [ECF No. 355]

Related Documents:

- J. Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors [ECF No. 145]
- K. Disclosure Statement for Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors [ECF No. 146]
- L. Declaration of D. Reid Snellengarger [ECF No. 148]
- M. Notice of Filing of Proposed Order [ECF No. 150]
- N. Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors [ECF No. 314]
- O. Amended Disclosure Statement for Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors [ECF No. 315]
- P. Notice of Filing of Revised Proposed Order [ECF No. 316]

Status: This matter has been adjourned to April 23, 2019 at 2:00 p.m. solely with respect to approval of the Disclosure Statement and Solicitation Procedures.

Dated: April 10, 2019 New York, New York

/s/ Sunny Singh

WEIL, GOTSHAL & MANGES LLP 767 Fifth Avenue New York, New York 10153 Telephone: (212) 310-8000

Facsimile: (212) 310-8007 Ray C. Schrock, P.C.

Sunny Singh

Attorneys for Debtors and Debtors in Possession